

COPY

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

BROAD-BUSSEL FAMILY LIMITED
PARTNERSHIP, MARIE LOUISE
MICHELSON, MICHELLE MICHELSON,
and HERBERT BLAINE LAWSON, JR.,
Individually and on Behalf of All Other
Persons and Entities Similarly Situated,

Plaintiffs,

vs.

BAYOU GROUP LLC, et al.,

Defendants.

JAN 13 4 58 PM '06

CASE NUMBER 3:05 CV 1762 (JBA)
U.S. DISTRICT COURT
NEW HAVEN, CONN.

**MOTION TO ADMIT
FOREIGN COUNSEL PRO HAC VICE**

In accordance with D. CONN. L. CIV. R. 83.1(d), the undersigned attorney, duly admitted to practice before this Court, hereby moves that John K. Van De Weert, Esq., be permitted to represent defendant Citibank, N.A. in the above-captioned action for all matters related to this case, in addition to counsel of record who have already appeared for the defendant. John K. Van De Weert, Esq., is an attorney admitted to practice before the state court of Illinois, the local courts of the District of Columbia, as well as numerous other federal appellate and district courts (as set forth in greater detail in the attached Affidavit). In support of this motion, the undersigned states:

1. John K. Van De Weert is associated with the law firm of Sidley Austin LLP, 1501 K Street, N.W., Washington, D.C. 20005.
2. An affidavit setting forth the necessary information regarding the qualifications of John K. Van De Weert, Esq., to practice before this Court along with such other

information required by D. CONN. L. CIV. R. 83.1(d) is attached hereto as Exhibit A and made a part hereof.

3. John K. Van De Weert, Esq. was previously admitted to practice before this Court in Hanson v. Ocwen Federal Bank, No. 3:02-CV-960 (CFD), and was assigned identification number ct25413.

4. The undersigned has agreed to act as local counsel for Citibank, N.A. in this proceeding and, as such, agrees to be the Connecticut recipient of all pleadings and communications on behalf of defendant Citibank, N.A. All pleadings and communications may be sent to Gates Garrity-Rokous at the following address and telephone number:

Gates Garrity-Rokous
Wiggin and Dana LLP
One Century Tower
264 Church Street
New Haven, CT 06508-1832
Telephone: (203) 498-4310
Facsimile: (203) 782-2889
E-mail: ggr@wiggin.com

Respectfully submitted,

CITIBANK, N.A.

By: 

Gates Garrity-Rokous CT-15218
Wiggin and Dana LLP
One Century Tower
264 Church Street
New Haven, CT 06508-1832
Telephone: (203) 498-4310
Facsimile: (203) 782-2889
Email: ggr@wiggin.com

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BROAD-BUSSEL FAMILY LIMITED	:	
PARTNERSHIP, MARIE LOUISE	:	
MICHELSON, MICHELLE MICHELSON,	:	CASE NUMBER:
and HERBERT BLAINE LAWSON, JR.,	:	3:05 CV 1762 (JBA)
Individually and on Behalf of All Other	:	
Persons and Entities Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
BAYOU GROUP LLC, et al.	:	
	:	
Defendants.	:	

**AFFIDAVIT IN SUPPORT OF MOTION
FOR PERMISSION TO APPEAR PRO HAC VICE**

DISTRICT OF COLUMBIA)	
)	ss.
CITY OF WASHINGTON)	

JOHN K. VAN DE WEERT, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen (18) years and I understand the nature and obligations of an oath.
2. I am associated with the law firm of Sidley Austin LLP and may be reached through the following contact information:

John K. Van De Weert
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8000
Facsimile: (202) 736-8711
E-mail: jvandeweert@sidley.com

3. I submit this affidavit in support of a motion to be admitted to practice before this Court in the above-captioned matter as a visiting attorney *pro hac vice* pursuant to D. CONN. L. CIV. R. 83.1(d).

4. I am a member in good standing of the bar of the State of Illinois (and have been since 1998), and am a member in good standing of the bar of the District of Columbia (and have been since 2004). I am also admitted and in good standing in the following courts:

- U.S. Court of Appeals, 3d Circuit, 2001
- U.S. Court of Appeals, 11th Circuit, 2004
- U.S. Court of Appeals, 2d Circuit, 2005
- U.S. District Court, N.D. of Illinois – General, 1999
- U.S. District Court, C.D. of Illinois, 2001
- U.S. District Court, E.D. of Michigan, 2002.

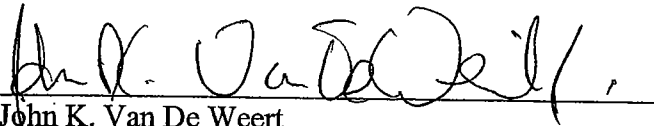
5. I was previously admitted to practice before this Court in Hanson v. Ocwen Federal Bank, No. 3:02-CV-960 (CFD), and was assigned identification number ct25413.

6. I have not been denied admission or disciplined by this Court or any other Court.

7. I have fully reviewed and I am familiar with the Rules of the United States District Court for the District of Connecticut.


8. The granting of this motion will not require modification of any scheduling order entered by this Court pursuant to FED. R. CIV. P. 16(b) or the standing order on scheduling in civil cases.

9. I have requested that Gates Garrity-Rokous, Esq., of the firm of Wiggin and Dana LLP, One Century Tower, 265 Church Street, New Haven, CT 06508-1832, act as local counsel, and I understand that he will be receiving service of papers and communications in this matter with me on behalf of defendant Citibank, N.A.


John K. Van De Weert

Subscribed and sworn to before me this
12th day of January, 2006.

JUNE FAITH JACKSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires December 14, 2008


Notary Public
My Commission expires:

CERTIFICATION

This is to certify that a true and correct copy of the foregoing was delivered by
United States mail, postage prepaid, to the following this 13th day of January, 2006:

Lane L. Vines, Esq.
Merrill G. Davidoff, Esq.
Lawrence J. Lederer, Esq.
Berger & Montague, PC
1622 Locust Street
Philadelphia, PA 19103

William M. Bloss, Esq.
Koskoff, Koskoff & Bieder, PC
350 Fairfield Avenue
Bridgeport CT 06604

Patrick J. McHugh, Esq.
William Morten Tong, Esq.
Finn Dixon & Herling
One Landmark Square
Suite 1400
Stamford, CT 06901

Sung-Hee Suh, Esq.
James Breitenbucher, Esq.
Schulte Roth & Zabel
919 third Avenue
New York, NY 10022

Lawrence E. Fenster, Esq.
Matthew Plant, Esq.
Bressler Amery & Ross
17 State Street
New York, NY 10004

Marc J. Grenier, Esq.
DePanfilis & Vallerie LLC
25 Belden Avenue
PO Box 699
Norwalk, CT 06852-0699



Gates Garrity-Rokous